





TO: Chief Elected Officials
State Workforce Innovation Council Chairperson
Marion County Workforce Investment Board Chairperson & Director
Regional Workforce Board Chairpersons
Regional Operators
Directors of Operations for Northern and Southern Indiana

FROM: Teresa L. Voors 
Commissioner, Indiana Department of Workforce Development

THROUGH: Dustin Stohler 
Deputy Commissioner, Legal Affairs and Administration

DATE: April 4, 2008

SUBJECT: DWD Policy 2007-28
State Level and Sub-Recipient Monitoring Policy

Purpose

To issue policy regarding state level programmatic monitoring and the oversight role of the chief elected official, in concurrence with the Workforce Investment Board or Regional Workforce Board, as it relates to subrecipient monitoring

Rescission

DWD Policy 2004-36, Subrecipient Monitoring Policy, issued May 4, 2005

Background

20 Code of Federal Regulations Part 667.410(a) of the Workforce Investment Act Final Rules states:

Each recipient and subrecipient must conduct regular oversight and monitoring of its WIA activities and those of its subrecipients and contractors in order to:

- (1) Determine that expenditures have been made against the cost categories and within the cost limitations specified in the Act and these regulations;
- (2) Determine whether or not there is compliance with other provisions of the Act and the WIA regulations and other applicable laws and regulations; and
- (3) Provide technical assistance as necessary and appropriate.

Contents

State Level Monitoring

The Indiana Department of Workforce Development (DWD) Oversight Division will conduct on-site, annual programmatic monitoring of both Workforce Investment Boards and Regional Workforce Boards. This monitoring process will entail a review of each Region's adherence to DWD Policy 2007-20 – Regional Integration Policy and the Region's approved Integration Plan as well as compliance with the Workforce Investment Act and all associated regulations. The monitoring process shall also review compliance as it relates to the provision of services and expenditures under the Workforce Investment Act, Wagner-Peyser, Trade Adjustment Assistance Act and Veteran's Program. The process will also review compliance with local policy and may include the validation of participant data entered in to the TrackOne case management system.

The Department shall establish an annual schedule of state level monitoring to be published on the DWD Oversight Division website. The Department shall not be limited by this schedule. The Department may, at its discretion, monitor any Region at any time for compliance with any provision of the Workforce Investment Act and compliance with State and DWD policies.

Sub-Recipient Level Monitoring

Each chief elected official, in concurrence with the Workforce Investment Board or Regional Workforce Board, must monitor all service providers and subrecipients (excluding service providers paid by an individual training account), on-site at least annually, or once during the term of agreement if it lasts less than one year, for financial and programmatic compliance.

The entity issuing the contract must monitor each on-the-job (OJT) and customized training employer on-site at least annually, or once during the term of agreement in accordance with 20 CFR Part 667.410(a). Additionally, the chief elected official, in concurrence with the Workforce Investment Board, is responsible for conducting oversight on-site at least annually of local youth programs operated under this Act, to ensure both fiscal and programmatic accountability.

Procedures should address the monitoring of payment point contracts to verify that those subrecipients have expended excess cash before requesting additional drawdowns as discussed in the One Stop Comprehensive Financial Management Technical Assistance Guide at II-6-3. Each chief elected official, in concurrence with the Workforce Investment Board or Regional Workforce Board, is required to develop and use local monitoring procedures, monitoring instruments, and monitoring schedule. The monitoring schedule and any subsequent changes should be sent to all service providers and subrecipients. Additionally, each chief elected official, in concurrence with the Workforce Investment Board or Regional Workforce Board, must have a written monitoring policy, which includes, at a minimum, the following items:

- ◆ Identification of a monitoring scope
- ◆ Use of the monitoring guide
- ◆ Frequency of on-site monitoring
- ◆ Procedures for additional monitoring of high risk service providers
- ◆ Positions responsible for performing monitoring
- ◆ Procedures for documentation of findings
- ◆ Monitoring reports formats and time frames for issuance
- ◆ Monitoring resolution procedures including time frames

Questions concerning monitoring, including technical assistance and policy, may be addressed to the DWD Oversight Division at 317/233-4187.

Review Date

October 1, 2009

Ownership

DWD Oversight Division

Indiana Department of Workforce Development

10 North Senate Avenue

Indianapolis, IN 46204

Telephone: 317/233-4187

Effective Date

April 4, 2008

Action

The chief elected official, in concurrence with the Workforce Investment Board or Regional Workforce Board, is to ensure a local monitoring policy is written and implemented which fulfills the requirements outlined in this policy.